

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
	)	
Robert N. Bennett,	)	Bankruptcy No. 20-21772 GLT
	)	Chapter 13
Debtor	)	Related to Document No. 114 and 115
	)	
Ronda J. Winnecour, Chapter 13 Trustee,	)	
	)	
Movant	)	
	)	
v.	)	
	)	
Robert N. Bennett.	)	
	)	
Respondent	)	

**RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

**AND NOW** come the Debtors by and through attorney Christopher M. Frye, Esquire and responds to the Trustee's Motion to Dismiss as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Since the motion was filed, the Debtor has made additional payments.
5. Admitted.
6. Admitted in part and denied in part. It is admitted additional funds remain due. The

Debtor is wage attached and believes that an additional 60 days will allow him to complete the Chapter 13 Plan. complete.

**WHEREFORE**, Debtors respectfully request that the Court deny the Movant's Motion.

Dated: July 7, 2025

Respectfully submitted,

/s/Christopher M. Frye  
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